

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

Waverly D. Crenshaw, Jr.
US DISTRICT JUDGE

IN RE: REALPAGE, INC., RENTAL
SOFTWARE ANTITRUST LITIGATION
(NO. II)

Case No. 3:23-md-3071

MDL No. 3071

JURY DEMAND

Chief Judge Waverly D. Crenshaw, Jr.

This Document Relates to:

3:23-CV-00410

3:23-CV-00742

JOINT MOTION TO STAY DEADLINES AS TO CONTI

CONTI Texas Organization, Inc. d/b/a CONTI Capital (“CONTI”) is a defendant in the above-captioned cases. On April 18, 2024, this Court entered an Agreed Scheduling Order (Dkt. 891) relating to CONTI’s Rule 12(b)(1) Motions to Dismiss. The Order set a May 17, 2024 deadline for CONTI to serve initial disclosures, a May 30 deadline for CONTI to file its Rule 12(b)(1) motions in both cases, and gave Plaintiffs 90 days from that date to conduct jurisdictional discovery and file responses.

Both through the mediator and directly, Plaintiffs and CONTI have been exchanging information and engaging in discussions to resolve Plaintiff Vincin and Kabisch’s claims against CONTI. Those discussions have been productive. The parties agree that staying all deadlines as to CONTI would (a) facilitate those discussions and best position the parties to reach an agreement; and (b) conserve party resources and serve the interest of judicial economy. For these reasons, Plaintiffs respectfully request that the Court stay all deadlines as to CONTI in both the *Kabisch* and *Vincin* matters. Plaintiffs and CONTI would plan to provide an update to the Court within 90 days.